

forest plan amendment for bat conservation
Forest Plan Amendment for Bat Conservation

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03-27-2020

To:

Forest Coordinator USDA Forest Service
Ozark-St. Francis National Forest
605 West Main Street
Russelville, Ar.72801-3614

From:

Gary Norman,individually and as Trustee of Norman Property Trust

Subject:

Forest Plan Amendment for Bat Conservation

Lori Wood:

This amendment would change the secondary Bat Conservation zone boundaries from less than 68,000 acres to the entire 1.2 million acres of the Ozark St. Francis National Forest (OSFNF).(Forest Plan Amendment for Bat Conservation,2020 p2,p8). Proposed changes to the FW components and the expansion are not warranted based upon current data.

After more than 6 years of the Indiana Bat Habitat Restoration Project, the Indiana Bat population in Arkansas is declining.(King,2019) Each discovery of new hibernacula has been followed by a decrease of the Indiana Bat population under direct management, "Due in part to disturbance of the winter colonies by human entry into the caves". (Anderson,2020) All caves in the OSFNF except Blanchard Springs Caverns are closed to the public. Why ask for increased monitoring?

The Forest Service's position "we will continue to support the

forest plan amendment for bat conservation bat" (Anderson,2020) ignores the scientific data about bats carrying viruses and discounts any effect upon the quality of human environment.

The bat is a scientifically known carrier of viruses.(Calisher CH, 2006)(Dominguez SR, 2007)(Li W,2005)(Andersen G,2020) The Indiana Bat will emerge in spring, will migrate to summer maternity colonies outside the OSFNF bat zone, and will encounter others from different parts of the country possibly introducing viruses into the OSFNF ecosystem in the fall migration. The impact of this migration process should be minimized by containing the recovery efforts to present boundaries and not expanding to the entire OSFNF.

There are no P1 or P2 caves within the OSFNF and Arkansas's Indiana Bat population is ONE HALF OF ONE PERCENT of the total Indiana Bats.(King,2019) Although the opportunity to study smaller hibernacule compared to larger populations is here, the Forest Service not only discounts the possible health consequences, The Forest Plan Amendment for Bat Conservation advocates expansion over the entire OSFNF.

The Forest Service claims the Indiana Bat Habitat Restoration Project is not subject to cost transparency. The budget does not include money contributed by other sources and NO accountability is required. I disagree. How much money spent by government and upon what it is spent is public information and should be available in electronic format at any time upon request.(FOIA,2016) The Forest Service mission statement is "protect the land and serve people". How can hiding cost serve people? Expenditures, regardless of source, are public information.

The present methods employed will destroy the sustainability of the forest. Cutting the round wood eliminates a 20-50 year production cycle. If this were applied to the entire forest, future generations will be denied income opportunities. Presently,

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this does not show because the figures are offset by averaging
small areas like the bat habitat with the entire forest
effectively hiding the economic impact to particular areas.
Bats have coexisted with other species within the forest over time
and will continue to do so if they are not disturbed. When the
methodology contributes to the destruction, one should not ignore
the facts and apply more of the same.

In summary, this is not the time for changes sought by The Forest
Plan Amendment for Bat Conservation. This plan subverts the Forest
Services mission "protect the land and serve the people" and makes
bat conservation the number one priority of the OSFNF.

Thank you,

Gary Norman

Forest Plan Amendment for Bat Conservation,p2,p8
Calisher CH,2006 Bats: Important reservoir hosts of emerging
viruses. Clinical Microbiology Reviews 19:531
Dominguez SR, 2007 Emerging Infectious Diseases 13(9):1295-1300
Li W, 2005 Bats are natural reservoirs of SARS-like coronaviruses.
Science 310:676-679
Andersen K,2020 The proximal origin of SARS-COV-2. Nature Medicine
march 17 2020
King,R.2019 Indiana Bat (*Myotis soldalis*) 5-year Review: Summary
and Evaluation
Anderson,M2020 (Conference call 03-24-2020)
FOIA Improvement Act of 2016

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